

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
SOUTHERN DIVISION**

**WANDA WILLIAMS, INDIVIDUALLY AND  
AS CONSERVATOR FOR John Robert Williams,  
Jr., INCAPACITATED.**

**PLAINTIFF**

**VERSUS**

**CIVIL ACTION NO.: 1:14-CV-383-HSO-JCG**

**MANITOWOC CRANES, LLC; and  
CAIRO MARINE SERVICE, INC.**

**DEFENDANTS**

**STIPULATION OF DISMISSAL WITHOUT PREJUDICE**

COMES NOW, the Plaintiff, Wanda Williams, Individually and as conservator for John Robert Williams, Jr., Incapacitated, by and through counsel of record and files this her F.R.C.P. 41(a)(1)(A)(ii) Stipulation of Dismissal without Prejudice as it relates to the Defendant, Cairo Marine Service, Inc. All parties who have appeared in this action are in agreement as indicated by their signatures below. All of Plaintiff's claims against Manitowoc Cranes, LLC shall remain pending.

**SO STIPULATED** this the 20<sup>th</sup> day of May, 2015.

**Attorneys for Plaintiffs**

/s/ Desmond V. Tobias  
Desmond V. Tobias (PHV)  
Jason S. McCormick (PHV)  
Bryan E. Comer (PHV)  
Tobias, McCormick & Comer, LLC  
1203 Dauphin Street  
Mobile, AL 36604  
Phone: 251-432-5001  
[desi@tmclawyers.com](mailto:desi@tmclawyers.com)  
[jason@tmclawyers.com](mailto:jason@tmclawyers.com)  
[bryan@tmclawyers.com](mailto:bryan@tmclawyers.com)

/s/ Ben F. Galloway, III

Ben F. Galloway, III (MSB #4390)  
Owens, Galloway & Myers, PLLC  
P. O. Drawer 420  
Gulfport, MS 39502-0420  
Phone: 228-265-5109  
[bfg@owen-galloway.com](mailto:bfg@owen-galloway.com)

/s/ Clay Rankin, III

Clay Rankin, III (PHV)  
Rankin Law, LLC  
311 Magnolia Avenue  
Fairhope, AL 36532  
Phone: 251-509-2050  
[Clay.Rankin@gmail.com](mailto:Clay.Rankin@gmail.com)

**AGREED:**

/s/ David C. Goff

David C. Goff (MSB #8948)  
DEUTSCH, KERRIGAN & STILES, L.L.P.  
2510 14th Street, Suite 101  
Gulfport, MS 39501  
Telephone: (228) 864-0161  
[dgooff@dkslaw.com](mailto:dgooff@dkslaw.com)  
*Attorneys for Cairo Marine Service, Inc.*

/s/ Walter H. Boone

Walter H. Boone, Esq. (MSB #8653)  
J. Chase Bryan, Esq. (MSB #9333)  
Mandie B. Robinson, Esq. (MSB #100446)  
Thomas P. Watson, Esq. (MSB #104483)  
Forman Perry Watkins Krutz & Tardy LLP  
Post Office box 22608  
Jackson, MS 39225-2608  
[whboone@fpwk.com](mailto:whboone@fpwk.com)  
[jcbryan@fpwk.com](mailto:jcbryan@fpwk.com)  
[robinsonab@fpwk.com](mailto:robinsonab@fpwk.com)  
[watsontp@fpwk.com](mailto:watsontp@fpwk.com)  
*Attorneys for Manitowoc Company, Inc.,  
Manitowoc Crane Companies, LLC and  
Manitowoc Cranes, LLC*